



Lawrence S. Lustberg  
Director

Gibbons P.C.  
One Gateway Center  
Newark, NJ 07102-5310  
Direct: 973-596-4731 Fax: 973-639-6285  
llustberg@gibbonslaw.com

March 19, 2025

**VIA ECF**

Honorable Pamela K. Chen, United States District Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: United States v. McMahon, et al.**  
**Docket No. 21-cr-265**

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-referenced matter. I write to respectfully request that the Court enter the attached Proposed Order, which will allow Mr. McMahon to travel to Indiana for six (6) days, from Wednesday, March 26, 2025 to Monday, March 31, 2025, in order to attend the NCAA Midwest Regional games and visit Indiana University, Bloomington.

We have been in contact with Rhonda LeGrand of the United States Office of Pretrial Services, District of New Jersey, and Joseph Elie of the United States Office of Pretrial Services, Eastern District of New York, both of whom have advised that their respective Offices have no objection to Mr. McMahon's proposed travel, given that Mr. McMahon has, throughout the long pendency of this matter, always been in full compliance with the terms of his pretrial release; Pretrial Services requests only that it be provided with a travel itinerary, which we will certainly do – that requirement is reflected in the Proposed Order attached hereto. The Government, however, has advised that it does not consent to Mr. McMahon's proposed travel which it "do[es] not believe is an appropriate basis for a modification of Mr. McMahon's pretrial release conditions"; we disagree and most respectfully submit that Mr. McMahon's request should be granted.

If the enclosed Order is satisfactory to Your Honor, we would be most grateful if the Court would execute and file it at Your Honor's earliest convenience. Of course, if Your Honor has any questions or concerns, please do not hesitate to contact me. Thank you for your kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg  
Lawrence S. Lustberg

cc: All counsel of record (via ECF)